

STATEMENT OF DANIEL P. MATTHEWS
CHIEF INFORMATION OFFICER
U.S. DEPARTMENT OF TRANSPORTATION
BEFORE THE
COMMITTEE ON GOVERNMENT REFORM
SUBCOMMITTEE ON REGULATORY AFFAIRS
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Madam Chairperson and members of the Subcommittee, thank you for the opportunity to appear today to discuss the Department of Transportation's (DOT) compliance with the Paperwork Reduction Act (PRA) and DOT's efforts to reduce the information collection burden on our citizens.

As the Department's Chief Information Officer (CIO), I oversee DOT's information technology (IT) investment guidance, cyber security program and have operational responsibility for the Departmental network and communications infrastructure. I also serve as the vice-chair of the Federal Chief Information Officers Council. My role established through the PRA is to develop information collection policies and management strategy, and to provide advice and assistance within the agency on these matters.

DOT uses the information collection process as part of its regulatory responsibilities and to ultimately fulfill the agency's strategic objectives, including transportation safety and improving mobility. DOT is improving the information collection and management processes, but DOT also faces some challenges.

To put things into context, as of May 31, 2005 DOT has 367 approved, active information collections, totaling 253,305,417 burden hours, encompassing 3,787,209,858 responses. Of the 367 information collections, one – addressing truck driver's hours of service – accounts for 65% (160 million hours) of DOT's total public burden hours. The remaining 366 information collection activities account for thirty-five percent (35%). Overall, DOT currently ranks third among Federal agencies in collection burden hours placed on the public, following the Department of Treasury and the Department of Health and Human Services.

DOT PAPERWORK REDUCTION ACT COMPLIANCE PROCESS

The Information Collection Request (ICR) process requires agencies to provide detailed justification and supporting explanations of how information will be collected and why each information collection is essential to an agency's mission. Additionally, the ICR process links collections of data to governing federal rules or regulations, and provides an estimate of the burden imposed on the public. OMB then weighs the agency's business need for the information against the cost to citizens or businesses.

DOT complies with the PRA through an established compliance process meant to ensure that the standards outlined in the PRA are met, and at the same time minimize the burden imposed on the public. Individual program offices within the Department officially initiate all information collection activities. The impetus for these collections stems from a variety of requirements, including agency rule-making activities, new public laws, or self-determined needs of the program offices. The general chronology for

preparing an ICR submission varies from organization to organization depending on the number of reviews and other factors. The first step in DOT's process requires that program officials within the agency's Operating Administrations (OA) first validate the need for an information collection in response to a new requirement, such as a new rule or public law. The OA program official prepares and submits a 60-day Federal Register notice, giving the public an opportunity to comment on the ICR. The OA program official then generates an ICR package which addresses the PRA standards, and includes the supporting statement, background materials and any forms associated with the ICR. If the program official receives comments from the 60-day Federal Register notice, the program official may revise the ICR if warranted. The ICR package is reviewed and approved by the OA program official because the OA program official receives data from other individuals within their operating administration to complete the ICR package. Once the ICR package has been approved by the OA program official, the ICR is then submitted to the OA PRA Coordinator for additional review and approval. Concurrently, the OA program office prepares and submits their 30-day Federal Register notice informing the public the ICR is being submitted to OMB for review/approval. The OA PRA Coordinator works with the OA program official conducting the collection to ensure the PRA standards are being addressed. For example, the PRA Coordinator ensures that the information gathered will achieve the goals stated by the Program Office and the collection methods used are sound and appropriate. If the OA PRA Coordinator does not find that all PRA standards are being met, the ICR will be returned to the OA Program Official for more complete compliance with the ten PRA standards prior to submission to OMB.

If the OA PRA Coordinator approves an ICR and determines that the collection involves statistical methods, the ICR must also be approved by a Transportation Statistician within DOT's Research and Innovative Technologies Administration (RITA) prior to submission to DOT's PRA Clearance Officer in the DOT Office of the Chief Information Officer. Upon receipt of the ICR by the DOT PRA Clearance Officer, the package is again reviewed for compliance with the PRA standards. If the DOT PRA Clearance Officer determines that there are inconsistencies, inaccuracies or non-compliance with the PRA standards, the ICR is returned to the OA PRA Coordinator so that the collection may be re-worked. For example, if the program office does not provide an adequate explanation of the calculation of the proposed burden hours, the ICR would be rejected. If the PRA Clearance Officer determines that the collection is overly burdensome on the public, the ICR will be returned with suggestions for changes to reduce the burden. Once the DOT PRA Clearance Officer determines that the ICR is acceptable, the package is electronically submitted to the Office of Management and Budget (OMB) for processing and review.

DOT Operating Administrations ICRs have been turned down in DOT's process. When collections are turned down it may be because they duplicate existing collections or did not meet the PRA threshold for requiring OMB-approval. With respect to duplicate requirements, these are normally consolidated into existing collections and then submitted to OMB for approval.

What is important about the process is that it allows DOT, at various checkpoints, to determine the need for and the practical utility of the

information it proposes to collect. It is in everyone's interest that DOT ensures that all our information collection activities impose the minimum possible burden on the public and that the information gathered is of the utmost utility.

DOT INFORMATION COLLECTIONS AND BURDEN HOURS

The scope of the information to be collected and its frequency is dictated by the needs of a particular program. Some programs may have operational requirements that require near real-time collection of information in order to be effective, while other programs may be managed effectively with less frequent reporting. Some examples of reporting frequency include the following:

- At the National Highway Traffic Safety Administration (NHTSA), "the odometer collection" requires automotive dealers to issue odometer statements to customers at the time of purchase. Most other NHTSA collections are collected annually.
- The Office of the Secretary of Transportation's (OST) information collection for the Essential Air Service program (2106-0044 Air Carriers' Claims for Subsidy Payments) includes claims, typically filed monthly, by air carriers seeking subsidy payments for the services provided. Although the authorization granted, particularly in U.S.C. 41733(d), gives the Secretary of Transportation discretion in deciding how to make payments (which translates directly into how often to require/permit carriers to submit their claims), communications from the air carriers suggest that none wish to be

paid less frequently than monthly. Indeed, carriers have from time to time sought payment more frequently (typically every two weeks).

The reporting frequency can be changed, which minimizes the burden, but still enables DOT to accomplish program objectives. For example, when DOT revised the reporting form for FAA, Federal Highway Administration and Federal Transit Administration recipients on disadvantaged business enterprise (DBE) achievements, DOT reduced the reporting frequency from quarterly to semiannually or annually depending on the DOT Operating Administration's requirements.

From a historical perspective, since the beginning of FY2000, DOT's total burden has fluctuated due to (1) adjustments, (2) agency actions, (3) changes in statute, and (4) lapses in OMB approval. An accounting of burden changes as reported annually to OMB since the beginning of FY2000 is provided in Table 1:

Table 1

DOT Annual Changes in Burden Hours 2000-2004 (in millions)						
Year	Program Changes in Burden Due to Statute "A"	Program Changes in Burden Due to Lapses in OMB Approval "B"	Program Changes in Burden Due to Agency Action (Discretionary Changes) "C"	Total Program Changes in Burden (A+B+C=D) "D"	Changes in Burden Due to Adjustments "E"	Total Burden Hours (Millions) Prior year burden hours plus current year burden changes and adjustments=current total "F"
FY1999	-	-	-	-	-	140
FY2000	.05	28.32	(56.65)	(28.28)	5.88	117.60
FY2001	1.07	(42.39)**	0	(41.32)	5.11	80.34*
FY2002	.78	0.00	163.24***	163.32	1.2	245
FY2003	2.85	(1.37)	4.92	6.45	(1.48)	249.69
FY2004	1.21	1.23	(0.47)	1.97	(0.32)	250.79

*Due to a PRA violation, the program change total for FY2001 includes a reduction of 42,464,327 hours. DOT inadvertently allowed OMB's approval of a Federal Motor Carrier Safety Administration, Drivers Record of Duty Status, to expire on September 30, 2001. DOT continued to use this collection in violation of the PRA until it obtained a reinstatement of OMB's approval on March 4, 2002.

**DOT data unavailable. Numbers reported are from OMB's FY2002 Report to Congress.

***This total reflects for the most part an increase due to a reinstatement of an ICR which included a program change and an adjustment in burden hours –Drivers Record of Duty Status, amounting to 161,364,492 burden hours.

The significant FY2002 change reflected in the table above was due to several factors: 1) in FY2001 DOT's information collection 2126-0001 Driver's Record of Duty Status (RODS) went into a violation stage at the time of renewal, and 2) there was an adjustment of 118,900,165 burden hours, increasing the total burden hours for this collection to 161,364,492 at the time of OMB reinstatement of the collection on March 4, 2002. The adjustment was due to changes in the estimates of time for the drivers to complete a RODS and the time necessary for the motor carriers to review and file the RODS.

DOT Paperwork Reduction Act Violations

OMB rarely rejects DOT ICR packages. However, OMB in the past has returned DOT's ICRs for various reasons, including: a determination that the agency should further review public comments received; requests for additional details about the collection's methodology; premature submission prior to the publication of a Final Rule; or a determination that the proposed information collection is redundant of another already approved collection. Also, OMB will sometimes approve an ICR package with a "term of clearance" allowing the collection to take place, but either requiring the agency to supply more information or granting the collection a shorter approval period than requested.

Failure to comply with the requirements of the Act is a violation. If an agency's violation is not resolved in a timely manner, the issue is raised in OMB's management chain and can result in official Departmental reprimands and may have budget implications. DOT's process is that if an unapproved collection has already occurred and it is ongoing in nature, the program official should bring the violation to the attention of the DOT PRA Clearance Officer and work to resolve the violation as soon as possible. If an unapproved collection is conducted and it is a one-time collection, there is no further action that an agency can take to rectify the violation in the short term. Other violations include when an agency does not submit an information collection to OMB on a timely basis or request for renewal of OMB approval under the PRA.

Annually, DOT must submit a summary of information collection activity for the previous fiscal year and a forecast for the coming fiscal year. This summary must also include a description of each violation and the action taken, if any, to resolve the issue.

DOT's past and current collections in violation of the PRA dating back to FY2000 are provided in Table 2:

Table 2

DOT Collections in Violation of the Paperwork Reduction Act 2000-2004				
Year of Violation	OMB Number	Information Collection Title	Description of the violation	Explanation of Correction
2000	2105-543	Consumer Compliant forms	Forms placed on a web page without OMB approval.	The Department's CIO and OIG worked with OMB to resolve the violation.
2000	2126-0001	Driver's Record of Duty Status	Failed to report a segment of the regulated population.	Requested and obtained approval, increasing the number of respondents, burden hours and burden costs.
2000	2126-0004	Driver Qualification Files	Failed to report a segment of the regulated population.	Requested and obtained approval, increasing the number of respondents, burden hours and burden costs.
2000	2133-0532	Evaluation of the Military Sealift Program (MSP) and the Voluntary Intermodal Sealift Agreement (VISA)	Requested public comments through solicitation of a Federal Register Notice on April 18, 2000 without OMB approval	Agency requested an emergency approval from OMB. The information collection did not warrant an emergency approval and the agency did not want to process the collection through the normal approval procedures. Maritime withdrew their submission and discontinued information collection activities.
2001	2139-0002	Motor Carrier Quarterly Report	Forms placed on a web page without OMB approval.	The Department's CIO and OIG worked with OMB to resolve the violation.
2001	2139-0004	Annual Report of Class 1 Motor Carriers of Property	Collection form had not been approved by OMB.	Collection form faxed to OMB on Jan. 30, 2002 and approved.

2001	2105-0531	Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations	Collection form had not been approved by OMB.	Collection form faxed to OMB on Jan. 30, 2002 and approved.
2001	2115-0015	Shipping Articles	Lapse of OMB approval, expired 11/30/2000.	Submitted ICR to OMB and reinstated 3/30/01
2001	2115-0073	Alternative Compliance for International and Inland Navigation Rules -- 33 CFR Parts 81 and 89	Lapse of OMB approval, expired 07/31/2001.	Submitted ICR to OMB and reinstated 9/17/2001.
2001	2115-0120	Oil and Hazardous Materials Transfer Procedures	Lapse of OMB approval, expired 09/30/2001	Submitted ICR to OMB and reinstated 11/14/2001
2001	2115-0580	Outer Continental Shelf Activities-- Emergency Evacuation Plans for Manned OCS Facilities; Design & Plan Approvals; In-service Inspection & Letter of Compliance	Lapse of OMB approval, expired 02/28/2001.	Submitted ICR to OMB and reinstated 4/12/2001.
2001	2126-0001	Hours of Service of Driver Regulations	Lapse of OMB approval, expired 9/30/2001.	Submitted ICR to OMB and reinstated 3/4/2002.

2001	2126-0018	Request for Revocation of Authority Granted	Lapse of OMB approval, expired 01/31/2001.	Submitted ICR to OMB and reinstated 4/12/2001.
2001	2127-0008	Consumer Complaint/Recall Audit Information	Lapse of OMB approval, expired 09/30/2001.	Submitted ICR to OMB and reinstated 2/20/2002.
2001	2127-0043	Manufacturers' Identification -- 49 CFR Part 566	Lapse of OMB approval, expired 09/30/2001.	Submitted ICR to OMB and reinstated 2/7/2002.
2001	2127-0044	Names and Addresses of First Purchasers of Motor Vehicles	Lapse of OMB approval, expired 09/30/2001.	Submitted ICR to OMB and reinstated 2/7/2002.
2001	2127-0045	Petitions for Inconsequentiality -- 49 CFR 556	Lapse of OMB approval, expired 09/30/2001	Submitted ICR to OMB and reinstated 2/7/2002.
2001	2127-0052	Brake Hose Manufacturers Identification	Lapse of OMB approval, expired 09/30/2001.	Submitted ICR to OMB and reinstated 11/26/2001.
2001	2127-0576	Voluntary Child Safety Seat Registration Form	Lapse of OMB approval, expired 09/30/2001.	Submitted ICR to OMB and reinstated 01/22/2002.
2003	2125-0034	Certification of Enforcement of Vehicle Size and Weight Laws	Lapse of OMB approval, expired 5/31/2003.	Submitted ICR to OMB and reinstated 7/29/2003.
2003	2125-0586	State Right of Way Operations Manuals	Lapse of OMB approval, expired 8/31/2003.	Submitted ICR to OMB and reinstated 3/9/2004.
2003	2127-0004	Defect and Noncompliance Notification	Lapse of OMB approval, expired 1/30/2003.	Submitted ICR to OMB and reinstated 2/27/2003.
2003	2127-0511	49CFR Part 571.213, Child Restraint Systems	Lapse of OMB approval, expired 9/30/2003	Submitted ICR to OMB and reinstated 3/9/2004
2003	2127-0635	Exemption from Make Inoperative	Agency was collecting information without OMB approval.	ICR to OMB for an approval number, approved 10/23/2003

		Prohibition		
2003	2130-0004	Railroad Locomotive Safety Standards and Event Recorders	Lapse of OMB approval, expired 9/30/2003	Submitted ICR to OMB and reinstated 9/23/2004
2003	2130-0526	Control of Alcohol and Drug Use in Railroad Operations	Lapse of OMB approval, expired 7/31/2003.	Submitted ICR to OMB and reinstated 2/24/2004.
2003	2139-0003	Class I Quarterly and Annual Report of Motor Carriers of Passengers	Lapse of OMB approval, expired 2/28/2003	Submitted ICR to OMB and reinstated 6/16/2003.
2004	2106-0030	Aircraft Accident Liability Insurance	Lapse of OMB approval, expired 2/29/2004.	Submitted ICR to OMB and reinstated 9/28/2004.
2004	2120-0018	Certification Procedures for Product and Parts FAR 21	Lapse of OMB approval, expired 7/31/2004.	Submitted ICR to OMB and reinstated 9/29/2004.
2004	2120-0620	Special Federal Aviation Regulation No. 71	Lapse of OMB approval, expired 1/31/2004	Submitted ICR to OMB and reinstated 1/21/2005.
2004	2125-0010	Bid Price Data	Lapse of OMB approval, expired 6/30/2004	Submitted ICR to OMB and reinstated 9/28/2004.
2004	2125-0019	Federal-Aid highway Construction Equal Employment Opportunity	Lapse of OMB approval, expired 1/31/2004.	Submitted ICR to OMB and reinstated 4/23/2004
2004	2125-0519	Developing and Recording Costs for Utility Adjustments	Lapse of OMB approval, expired 1/31/2004.	Submitted ICR to OMB and reinstated 12/16/2004.
2004	2125-0521	Developing and Recording Costs for	Lapse of OMB approval, expired 1/31/2004.	Submitted ICR to OMB and reinstated 4/23/2004.

		Railroad Adjustments		
2004	2125-0522	Utility Use and Occupancy Agreements	Lapse of OMB approval, expired 1/31/2004.	Submitted ICR to OMB and reinstated 12/15/2004.
2004	2125-0529	Preparation and Execution of the Project Agreement and Modifications	Lapse of OMB approval, expired 6/30/2004.	Submitted ICR to OMB and reinstated 9/28/2004.
2004	2125-0579	Drug Offenders' Drivers' License Suspension Certification	Lapse of OMB approval, expired 6/30/2004	Submitted ICR to OMB and reinstated 9/28/2004.
2004	2125-0586	State Right-of-Way Operations Manuals	Lapse of OMB approval, expired 8/31/2003.	Submitted ICR to OMB and reinstated 3/9/2004.
2004	2126-0011	Commercial Driver Licensing and Testing Standards	Lapse of OMB approval, expired 1/31/2004.	Submitted ICR to OMB and reinstated 4/23/2004.
2004	2127-0511	Child Restraint System	Lapse of OMB approval, expired 9/30/2003.	Submitted ICR to OMB and reinstated 3/9/2004.
2004	2130-0526	Control of Alcohol and Drug Use in Railroad Operations	Lapse of OMB approval, expired 7/31/2003.	Submitted ICR to OMB and reinstated 2/24/2004.

As reflected in the Table 2, DOT quickly addresses all violations. It should be noted that at this time, DOT is only aware of two PRA violation. Both operating administrations completed the study used for the violations and these violations will be reported in the FY2006 ICB report. On a broader scale, DOT continues to educate DOT staff on the PRA and the information collection process.

FUTURE COLLECTION PROJECTIONS

In looking to the future, DOT PRA officials continually review pending rulemaking activities to determine which involve a public collection burden. Of the eighty-seven significant rulemakings currently reported by DOT's Office of the General Counsel, DOT's PRA Officers have identified seven rulemakings that may require OMB review for PRA approval. According to DOT's Information Collection Tracking System report of current collections, DOT has approximately 175 collections that are due to expire within FY05 and FY06. DOT expects to renew most, if not all, of these collections.

DOT BURDEN REDUCTION INITIATIVES

As to what steps DOT is taking to reduce the reporting burden, I first note that the majority of the Department's information collections are in response to enacted laws that are intended to ensure the safety of the traveling public. As a result, the reality of making annual percentage decreases in collection burden hours is a challenging task.

DOT works diligently to minimize public burden through the review process of each new collection as described earlier, but has conducted a number of initiatives over the past four years to reduce information collection burdens to the lowest possible level. Table 3 below shows burden reduction endeavors initiated since FY 2001:

Table 3

DOT Burden Reduction Initiatives 2001-2005				
Year	OMB Control Number	DOT Operating Administration	Title of Information Collection	Estimated Burden Reduction (Hours)
2001	2130-0005	Federal Railroad Administration (FRA)	Hours of Service Regulations	2,666,666
2001	2130-0004	FRA	Railroad Locomotive Safety Standards and Event Recorders	182,000
2001	2138-0040	Research and Innovative Technology Administration (RITA)/Bureau of Transportation Statistics (BTS)	Traffic Reporting System	15,084
2001	2120-0001	Federal Aviation Administration (FAA)	Notice of Proposed Construction or Alteration and Notice of Actual Construction or Alteration and Project Status Report	15,500
2001	2120-0021	FAA	Certification: Pilots and Flight Instructors	350
2001	2125-0501	Federal Highway Administration (FHWA)	National Bridge Inventory (NBI) system	540,000
2001	2132-0008	Federal Transit Administration (FTA)	National Transit Database	238,140
2002	2110-0002	Transportation Security Administration (TSA)	Aviation Security Infrastructure Fee	31,200
2002	2110-0009	TSA	Certification of Screening Companies 14 CFR Part 111	58,643
2002	2115-0514	United States Coast Guard (USCG)	Continuous Discharge Book, Revised Merchant Mariner Application, Physical Report, New Sea	61,969

			Service, Chemical Testing and Entry Level Physical Forms.	
2002	2120-0075	FAA	Airport Security, 14 CFR Part 107	103,587
2002	2120-0673	FAA	Criminal History Records Checks 14 CFR Parts 107 and 108	123,471
2002	2130-0544	FRA	Passenger Equipment Safety Standards	14,780
2002	2132-0502	FTA	49 U.S.C. Sections 5309 and 5307 Capital Assistance	319,134
2003	2105-0548	Office of the Secretary (OST)	Procedures for Compensation of Air Carriers	43,164
2003	2125-0590	FHWA	Customer Satisfaction Surveys	10,678
2003	2126-0001	FMCSA	Driver's Records of Duty Status	1,824,000
2003	2137-0034	Pipeline and Hazardous Materials Safety Administration (PHSMA)	Hazardous Materials Shipping Papers & Emergency Response Information	361,111
2004	2126-0012	FMCSA	Controlled Substances and Alcohol Use and Testing	573,490
2005	2126-0013; 2126-0016; and 2126-0019	FMCSA	Unified Registration System	153,465
2005	2125-0032	FHWA	Fuels and FASH System	4,000
2005	2105-0517	OST	Transportation Acquisition Regulation (TAR)	30,601

One example of how DOT is taking steps to reduce burden above and beyond what is required by the law is an initiative found in Table 3, the Federal Railroad Administration's (FRA) Hours of Service collection. Agencies such as FRA are demonstrating that information technology can and does reduce burden. For instance, FRA grants waivers to railroads to

capture and retain hours of duty data in an electronic form. Converting paper to electronic records has been a longstanding and important initiative to improve the performance of this vital safety program while reducing the burden on affected railroads. This not only saves the railroads paper and storage costs, but also serves to reduce the paperwork burden, which to date has saved over 772 thousand hours.

INFORMATION COLLECTION CHALLENGE

Even in light of the improvements and reductions described above, the bulk of DOT's information collection burden is represented by a single information collection activity which imposes 65% (160 million hours) of DOT's total public burden hours. This collection is the FMCSA's "Hours of Service Rule," a rule which has been in effect since the late 1930's and has been revised and issued in final form several times. The Hours of Service (HOS) regulations require certain Commercial Motor Vehicle (CMV) drivers to prepare and maintain a record of duty status. For FY2005, DOT expects to publish a Final Rule no later than September 30, 2005. Two additional rules – HOS Supporting Documents and Electronic On-board Recorders – are also actively being developed, with many provisions ultimately subject to public notice and comment. These last two rules noted above are slated to be published in 2006.

CONCLUSION

DOT participates in the government-wide Business Gateway initiative that uses automation to reduce the burden of information collection. Goals for this initiative are to reduce the government paperwork burden for citizens and businesses with special attention to regulatory paperwork; and to

establish a proven methodology by which the government can harmonize and streamline data collection and forms. Expected outcomes by participating agencies will be to realize administrative efficiencies that will help further reduce information collection burdens DOT imposes on the public.

DOT is also working to improve the overall process of PRA information collection review and approval. Additionally, DOT has worked over the last three years to improve its Information Collection Tracking System (ICTS) used to process ICRs. The system has recently been recognized by several Federal agencies participating in the Federal Information Collection Tracking System workgroup as a management system they (the agencies) would also like to use. DOT is collaborating with these agencies to achieve this goal.

As my testimony describes, DOT has in place a process for PRA compliance and has had some success in reducing burden hours in some programs. However, DOT also faces significant challenges. Given the size of the collection burdens DOT imposes on the American public, additional steps are required to successfully reduce the burden.

I will work with the senior leadership in DOT to instill a sense of urgency to minimize the burden on the citizens and reduce violations. DOT's objective must be to have no PRA violations. This responsibility does not fall solely on agency PRA collection officers and coordinators, but is an effort best addressed through a variety of mechanisms, including the rulemaking process, training of program staff on PRA requirements and objectives,

stronger program management leadership who can help ensure that burdens are kept to a minimum, and ultimately making the best use of new information technologies. The Departmental Investment Review Board (IRB) must establish the optimal Information Technology (IT) portfolio that accomplishes and further supports DOT's mission, but also presents opportunities to reduce paperwork burdens imposed on the public. DOT has initiated a cross-agency approach to institutionalize substantive burden reduction among its largest collections. This will be achieved through: an analysis of all information collections by the DOT CIO Council; the identification of reduction opportunities and the time period when those reductions may occur (such as when collections are up for renewal); and the tracking of progress against stated objectives. DOT will focus on several critical strategies to achieve reductions: improving the efficiency of information collections; reducing the burden per response; promoting where feasible the use of electronic reporting; making adjustments where possible to the frequency of the collection; and creating partnerships internal to DOT and with other Federal agencies to ensure there is no duplicative reporting and to maximize data sharing.

In short, DOT is aware of the burden and is always looking for ways to reduce the burden and cost to industry while balancing its mission to ensure safety remains our #1 priority.

Again, I thank you for the opportunity to comment on this important topic and I look forward to answering any questions that you may have.